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September 5, 2001

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VIA HAND DELIVERY
PROPRIETARY INFORMATION ENCLOSED

David Waddell, Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37238

Re: *BellSouth Telecommunications, Inc.'s Entry Into Long Distance
(InterLATA) Service in Tennessee Pursuant to Section 271 of
the Telecommunications Act of 1996*
Docket No. 97-00309

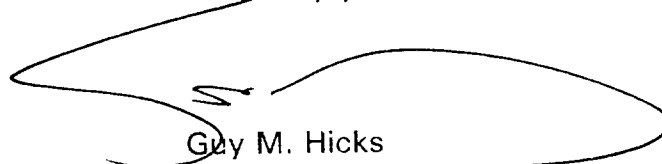
Dear Mr. Waddell:

Enclosed are five paper copies and 2 CD ROMs ("Public" and "Proprietary" versions) of BellSouth's responses to the discovery filed by the various parties in this proceeding. Both the paper copies and the Proprietary CD ROM contain proprietary information that should be treated in accordance with the terms of the Proprietary Order. CD ROM copies of BellSouth's responses were sent via overnight courier yesterday to counsel of record. As noted in its responses, there are a few data requests BellSouth is still working on. Bellsouth will file responses to those requests as soon as possible.

The KMC parties did not participate in the 1997 271 case and have not confirmed that they will abide by the terms of the Protective Order. Consequently, BellSouth provided copies of its non-proprietary discovery responses to the KMC parties and agreed to provide the proprietary portions of the responses as soon as the KMC parties confirm their agreement to abide by the Protective Order.

Thank you for your attention to this matter.

Very truly yours,



Guy M. Hicks

GMH:ch

409414

REQUEST: Please identify any and all BellSouth databases containing Loop Make-Up ("LMU") information for Tennessee.

RESPONSE: BellSouth databases containing LMU information for Tennessee include the Loop Facilities Assignment and Control System database (LFACS) and the Loop Engineering Assignment Data (LEAD) module of the Loop Engineering Information System (LEIS).

REQUEST: For each database identified in response to Interrogatory No. 1, please indicate whether competing local exchange carriers ("CLECS") have access to the Tennessee LMU information contained in such databases, and the manner in which CLECs are provided access (e.g., electronic, etc.). If CLECs are permitted electronic access to the databases in questions, please identify the BellSouth electronic interface (e.g., TAG, RoboTAG, LENS, etc.) through which electronic access is provided.

RESPONSE; CLECs may obtain access to LMU information residing in LFACS by either manual or electronic means. Access by manual means is obtained via the Manual LMU Service Inquiry ("LMUSI") process. CLECs may obtain access to LMU information residing in LFACS electronically by submitting queries via any one of the following BellSouth electronic interfaces: TAG, LENS, and RoboTAG. Once submitted to the BellSouth electronic interface, the query is passed to BellSouth's LFACS database.

The Loop Engineering Information System ("LEIS") is a family of applications that is made up of multiple modules that contain multiple databases. The Loop Engineering Assignment Data ("LEAD") module of LEIS contains a separate database for each wire center. This database is a once-per-month "snapshot" of the LFACS database. CLECs have access to the loop makeup data that resides in LFACS via TAG, LENS and RoboTAG. Because CLECs have access to LFACS, the source of the data in LEAD, it can be said that the CLECs have access to the information in LEAD, too. Additionally, CLECs have access to LQS, which uses LEAD for its LMU data. CLECs thus also have access to the data that resides in LEAD via LQS, provided they have the appropriate language in their interconnection agreement.

REQUEST: For each database identified in response to Interrogatory No. 1, please indicate the manner of access (e.g., electronic, etc.) that BellSouth personnel have to Tennessee-specific LMU information.

RESPONSE: BellSouth personnel have electronic access to the LFACS and LEIS/LEAD databases via a secure intranet.

REQUEST: For each wire center associated with BellSouth's Tennessee operations, please identify the percentage of loops by wire center for which LMU information is populated in BellSouth's Loop Facility Assignment and Control System ("LFACS") database.

RESPONSE: LMU information is populated in LFACS for 39% of BellSouth's facilities in TN. This figure varies by wire center. LMU information may be populated on some segments but not all within the database (for example, LMU may exist on feeder pairs but not on distribution facilities). In TN, 73% of the F1 feeder facilities have LMU information populated, while 22% of the F2, F3, etc. distribution facilities have LMU populated. This number is constantly increasing, as BellSouth's Methods and Procedures require the LMU data to be populated in LFACS when Engineering Work Orders are designed for new construction, cable rearrangements, etc. Additionally, Manual LMUSIs that are performed by BellSouth's Outside Plant Engineering group require the engineer to update LFACS with detailed LMU data. The attached spreadsheet shows this information, by wire center.

LMU Reg for: **TN**

WctrClli	English Name	Extraction Date	F1 LMU %	Fn LMU %	LMU %
Totals for State			73.31%	22.45%	39.49%
achltnmt	AdamsCedarHil	07/07/01	61.03%	11.51%	27.87%
artntnmt	Arlington	07/07/01	65.42%	13.48%	28.52%
ascytnma	AshlandCity	07/01/01	74.55%	9.40%	25.51%
athntnma	Athens	07/15/01	59.17%	14.31%	29.27%
bgsntnma	BigSandy	07/07/01	33.51%	3.25%	13.59%
blgptnma	BullsGap	07/01/01	27.20%	10.61%	15.67%
bllstnma	Bells	07/07/01	47.51%	7.19%	19.80%
blnctnmt	Blanche	07/21/01	47.74%	4.23%	20.58%
blvrtnma	Bolivar	07/01/01	57.90%	14.05%	29.19%
bntntnmt	Benton	07/07/01	50.00%	7.61%	21.27%
btsptnma	BethelSpring	07/15/01	46.28%	0	23.59%
bwvltnma	Brownsville	07/01/01	50.28%	12.03%	24.46%
chrltnmt	Charlotte	07/14/01	65.09%	5.68%	24.81%
chtgtnbr	Brainerd	07/22/01	68.75%	30.18%	43.02%
chtgtnndt	Dodds	07/01/01	84.86%	25.50%	46.53%
chtgtnht	Harrison	07/15/01	53.17%	10.98%	24.35%
chtgtnmv	MidValley	07/21/01	58.49%	13.35%	26.21%
chtgtnns	NinthSt	07/01/01	82.63%	46.03%	60.27%
chtgtnrb	RedBank	07/08/01	64.04%	22.56%	37.52%
chtgtnro	Rossville	07/22/01	61.67%	19.73%	33.78%
chtgtnse	StElmo	07/15/01	54.29%	18.88%	30.43%
chtgtnsm	SignalMtn	07/14/01	57.00%	19.33%	32.07%
chtnntnmt	Charleston	07/22/01	50.21%	7.01%	22.31%
cldgtnma	CumberlandGap	07/15/01	42.97%	4.89%	17.92%
clevtnma	Cleveland	07/08/01	63.16%	16.56%	31.04%
clmatnma	Columbia	07/01/01	81.80%	18.83%	38.96%
clntnma	Clinton	07/08/01	51.88%	15.94%	28.40%
clvltnma	Clarksville	07/15/01	71.40%	13.49%	29.75%
cmcytnmt	Cumberlandc	07/07/01	62.97%	5.81%	25.99%
cmdntnma	Camden	07/07/01	46.08%	8.68%	19.78%
cnhmtnma	Cunningham	07/14/01	47.73%	5.40%	18.84%
cnvltnma	Centerville	07/14/01	69.01%	6.93%	27.76%

LMU Reg for: **TN**

WctrClli	English Name	Extraction Date	F1 LMU %	Fn LMU %	LMU %
crpltnma	CrossPlainsOr	07/07/01	67.34%	12.19%	29.77%
crthtnma	Carthage	07/22/01	79.26%	21.80%	41.16%
crvlttnma	Collierville	07/15/01	79.19%	18.91%	39.98%
culkttnma	Culleoka	07/14/01	53.73%	4.52%	26.10%
cvtntnmt	Covington	07/08/01	62.32%	13.00%	29.25%
dctrtnmt	Decatur	07/07/01	64.66%	5.00%	22.25%
dkstnmt	Dickson	07/15/01	66.89%	16.95%	35.32%
dnrgtnma	Dandridge	07/01/01	57.44%	9.08%	24.10%
dovrtnmt	Dover	07/01/01	68.08%	5.17%	20.74%
dybgtnma	Dyersburg	07/15/01	69.51%	17.15%	34.67%
dyertnmt	Dyer	07/21/01	50.17%	8.70%	24.74%
dytnnma	Dayton	07/08/01	59.07%	12.92%	25.72%
eavlttnma	Eagleville	07/07/01	59.53%	6.85%	25.24%
etwhtnmt	Etowah	07/01/01	43.24%	7.69%	21.72%
fivlttnma	Friendsville	07/15/01	26.05%	8.70%	15.24%
fkIntncc	CoolSprings	07/07/01	96.82%	59.72%	68.52%
fkIntnma	Franklin	07/08/01	87.95%	20.09%	42.65%
flvlttnma	Flintville	07/21/01	62.57%	3.57%	26.37%
frdntnma	Fredonia	07/07/01	63.41%	5.87%	20.83%
frvwttnmt	Fairview	07/01/01	50.39%	11.50%	23.87%
fyvlttnma	Fayetteville	07/08/01	71.12%	13.28%	33.50%
galltnma	Gallatin	07/22/01	83.13%	17.14%	39.86%
gbsntnmt	Gibson	07/01/01	34.28%	2.93%	20.71%
gdjtttnma	GrandJunction	07/21/01	41.18%	10.79%	23.65%
gdvlttnma	Goodlettsville	07/21/01	87.01%	23.76%	42.12%
glsntnma	Gleason	07/14/01	48.22%	5.97%	22.99%
gnbrtnma	Greenbrier	07/01/01	79.54%	12.09%	33.00%
gnfdtnmt	Greenfield	07/01/01	49.51%	10.25%	24.43%
grnbtnma	Greenback	07/07/01	59.21%	6.42%	22.12%
gtbgtnmt	Gatlinburg	07/01/01	64.41%	15.40%	29.60%
gtwstnsw	Southwind	07/01/01	80.78%	46.65%	62.30%
hdvlttnma	Hendersonville	07/15/01	80.18%	18.47%	38.08%
hhnwttnma	Hohenwald	07/15/01	75.25%	9.37%	31.60%
himntnma	Harriman	07/22/01	54.98%	13.35%	27.88%
hllstnmt	Halls	07/07/01	51.41%	11.63%	27.96%
hmbttnma	Humboldt	07/16/01	53.23%	14.67%	28.11%
hmpstnma	Hampshire	07/07/01	59.11%	3.82%	24.85%
hnldtnma	Huntland	07/01/01	48.27%	6.30%	25.76%
hnngtnma	Henning	07/07/01	37.07%	16.56%	23.78%
hnsntnmt	Henderson	07/01/01	56.85%	10.40%	25.43%
hntgtnma	Huntington	07/22/01	53.03%	12.36%	24.54%
hrfrtnma	Hartford	07/07/01	43.08%	11.27%	21.89%
hrnbtnmt	Hornbeak	07/01/01	40.88%	4.17%	18.28%
htvlttnma	Hartsville	07/14/01	79.51%	11.37%	33.78%

LMU Reg for: **TN**

WctrClli	English Name	Extraction Date	F1 LMU %	Fn LMU %	LMU %
jcsntnma	JacksonMain	07/08/01	67.31%	18.54%	35.74%
jcsntnns	Northside	07/15/01	74.17%	26.38%	42.77%
jfcytnma	JeffersonCity	07/22/01	68.78%	21.34%	40.39%
jllctnma	Jellico	07/01/01	51.55%	6.75%	24.12%
jsprtnmt	Jasper	07/01/01	51.79%	15.02%	27.58%
kgntnmt	Kingston	07/01/01	45.70%	8.45%	19.62%
kntntnma	Kenton	07/21/01	41.79%	14.30%	26.10%
knvlttnbe	Bearden	07/01/01	79.62%	36.50%	53.66%
knvlttnfc	FountainCity	07/22/01	65.36%	17.77%	33.80%
knvlttnma	KnoxvilleMain	07/15/01	81.48%	30.43%	47.81%
knvlttnwh	WestHills	07/08/01	77.60%	28.38%	43.99%
knvlttnyh	YoungHigh	07/22/01	61.40%	15.19%	31.62%
lbnntnma	Lebanon	07/15/01	77.57%	20.91%	39.56%
lfltttnma	LaFollette	07/15/01	47.60%	11.22%	23.49%
lkcytnma	LakeCity	07/07/01	42.46%	18.52%	29.81%
lncytnma	LenoirCity	07/08/01	60.66%	14.75%	29.61%
lodntnma	Loudon	07/15/01	62.22%	11.36%	25.07%
lrbgtnma	Lawrenceburg	07/08/01	73.69%	14.34%	35.06%
lwbgtnma	Lewisburg	07/01/01	84.69%	18.75%	40.28%
lxtntnma	Lexington	07/21/01	52.38%	12.77%	26.01%
lybgtnmt	Lynchburg	07/01/01	75.57%	13.29%	37.17%
lylstnma	Lyles	07/22/01	70.54%	10.08%	30.16%
lyvlttnma	Lynnville	07/07/01	80.31%	9.32%	33.01%
mavlttnma	Maryville	07/01/01	67.53%	15.88%	31.48%
mckntnma	McKenzie	07/15/01	57.66%	14.90%	28.49%
mcwntnmt	McEwen	07/14/01	53.97%	3.85%	22.35%
mdtntnma	Middleton	07/21/01	39.07%	6.72%	17.31%
mdvitnmt	Madisonville	07/22/01	61.49%	10.01%	26.33%
medntnma	Medina	07/07/01	42.97%	5.48%	18.15%
milntnma	Milan	07/15/01	54.25%	13.25%	27.50%
mmphtnba	Bartlett	07/01/01	76.09%	25.00%	41.52%
mmphtnck	Cherokee	07/15/01	79.88%	8.56%	32.42%
mmphtnct	Chickasaw	07/15/01	81.46%	20.91%	42.85%
mmphtnel	Eastland	07/01/01	88.23%	47.73%	62.29%
mmphtnfr	Frayser	07/08/01	56.04%	11.15%	26.17%
mmphtngt	Germantown	07/01/01	76.19%	27.88%	43.70%
mmphtnhp	Humphries	07/01/01	72.45%	52.90%	60.04%
mmphtnma	MemphisMain	07/22/01	79.27%	34.79%	53.17%
mmphtnmt	Midtown	07/01/01	77.52%	26.98%	47.38%
mmphtnoa	Oakville	07/22/01	84.94%	33.59%	48.30%
mmphtnsl	Southland	07/22/01	76.54%	27.18%	41.76%
mmphtnst	Southside	07/01/01	63.58%	16.76%	31.56%
mmphtnww	Westwood	07/21/01	66.04%	9.48%	25.85%
mnchtnma	Manchester	07/21/01	66.52%	16.21%	36.65%

LMU Reg for: **TN**

WctrClli	English Name	Extraction Date	F1 LMU %	Fn LMU %	LMU %
mnpltnma	MtPleasant	07/21/01	68.46%	10.80%	31.06%
mrbotnma	Murfreesboro	07/15/01	81.15%	17.56%	38.29%
mrtwnma	Morristown	07/22/01	64.16%	16.41%	32.11%
msctnmt	Mascot	07/01/01	47.91%	14.60%	25.90%
mscwnma	Moscow	07/01/01	38.59%	8.05%	19.93%
myvltlnma	Maynardville	07/07/01	48.95%	13.66%	25.06%
nrrstnma	Norris	07/15/01	42.63%	10.45%	22.09%
nsvltnaa	AirportAuthori	07/21/01	91.86%	12.50%	88.33%
nsvltnap	Airport	07/08/01	89.51%	29.92%	50.76%
nsvltnbv	Bellevue	07/21/01	89.58%	21.10%	41.38%
nsvltnbw	Brentwood	07/15/01	91.79%	40.20%	55.12%
nsvltncd	CockrillBend	07/21/01	70.61%	41.49%	52.38%
nsvltinch	CrieveHall	07/22/01	89.92%	24.84%	46.84%
nsvltndo	Donelson	07/08/01	90.27%	30.60%	50.13%
nsvltnggh	BurtonHill	07/01/01	73.75%	21.34%	37.33%
nsvltnhh	HickoryHollow	07/22/01	72.03%	19.32%	39.01%
nsvltnin	Inglewood	07/01/01	91.21%	16.40%	40.21%
nsvltnmc	Madison	07/01/01	91.94%	16.97%	41.91%
nsvltnmt	Nashvillemain	07/08/01	87.68%	56.01%	69.05%
nsvltnst	Sharondale	07/15/01	92.40%	38.96%	59.30%
nsvltnun	University	07/15/01	92.62%	43.25%	64.39%
nsvltnwc	WhiteCreek	07/16/01	82.90%	10.15%	31.55%
nsvltnwm	WestMeade	07/01/01	86.56%	21.31%	45.39%
nwbtrnma	Newbern	07/14/01	55.57%	18.13%	32.78%
nwpptnmt	Newport	07/08/01	53.57%	13.18%	26.83%
okrgtnmt	OakRidge	07/08/01	75.45%	34.13%	49.61%
olhctnma	OldHickory	07/07/01	88.61%	11.74%	37.29%
olsptnma	OliverSpring	07/15/01	46.79%	10.27%	24.46%
parstnma	Paris	07/15/01	59.01%	14.87%	29.33%
plmytnma	Palmyra	07/21/01	28.69%	2.23%	12.31%
plsktnma	Pulaski	07/08/01	71.23%	10.84%	33.34%
psvwtnt	PleasantView	07/01/01	74.59%	8.04%	27.42%
ptbgtnt	Petersburg	07/14/01	29.55%	3.38%	18.66%
ptldnt	Portland	07/22/01	68.50%	17.26%	33.59%
rdgltnt	Ridgely	07/07/01	47.04%	15.15%	32.53%
rkwdnt	Rockwood	07/22/01	42.43%	12.16%	22.34%
rplynt	Ripley	07/14/01	54.76%	13.89%	28.03%
rrvltnt	Rogersville	07/08/01	62.40%	9.89%	29.30%
sangnt	Sango	07/01/01	70.93%	9.50%	23.20%
sddstnt	SoddyDaisy	07/15/01	53.23%	9.80%	23.06%
sewntnmw	Sewanee	07/01/01	67.78%	15.33%	37.03%
shvltnt	Shelbyville	07/15/01	75.58%	17.81%	36.26%
slmrnt	Selmer	07/22/01	48.18%	12.68%	24.12%
smtwnt	Summertown	07/01/01	66.36%	5.73%	29.72%

LMU Reg for: **TN**

WctrClli	English Name	Extraction Date	F1 LMU %	Fn LMU %	LMU %
smyrtnma	Smyrna	07/01/01	78.76%	16.49%	36.13%
sntftnma	SantaFe	07/01/01	42.16%	3.12%	19.83%
snvlttnma	Sneedville	07/21/01	34.94%	7.18%	22.10%
sohnmsdc	SouthHaven	07/01/01	71.50%	24.49%	36.74%
sovltnmt	Somerville	07/07/01	52.69%	10.46%	23.92%
spbgtnma	SouthPittsburg	07/21/01	51.42%	16.69%	29.49%
spcytnmt	SpringCity	07/22/01	39.79%	7.09%	17.52%
spfdtnma	Springfield	07/21/01	76.13%	15.15%	34.92%
sphlttnmt	SpringHill	07/07/01	76.78%	13.36%	31.22%
srvttnma	Surgoinsville	07/14/01	24.86%	13.29%	17.52%
svnhtnmt	Savannah	07/15/01	41.50%	6.66%	19.70%
svvlttnmt	Sevierville	07/08/01	64.05%	15.82%	28.77%
swtwttnmt	Sweetwater	07/01/01	47.67%	10.77%	21.47%
tllhttnma	Tullahoma	07/21/01	64.17%	18.49%	35.56%
tpvlttnma	Tiptonville	07/01/01	72.65%	20.11%	36.48%
trinttnma	Triune	07/07/01	55.27%	14.59%	30.63%
troytnmt	Troy	07/21/01	46.71%	18.58%	30.02%
trnttnma	Trenton	07/22/01	57.19%	10.61%	28.52%
twnsttnma	Townsend	07/01/01	58.19%	4.01%	16.48%
uncytnma	UnionCity	07/08/01	73.59%	17.38%	34.03%
vnlrtnma	Vanleer	07/07/01	45.50%	6.37%	23.05%
whbltnmt	WhiteBluff	07/22/01	65.87%	10.73%	28.51%
whhsttnma	WhiteHouse	07/07/01	81.49%	12.28%	31.11%
whpitnma	WhitePine	07/21/01	51.71%	11.03%	24.01%
whvlttnmt	Whiteville	07/07/01	46.71%	12.88%	26.88%
hwhlttnma	Whitwell	07/14/01	41.90%	13.77%	23.28%
wlpttnma	Williamsport	07/21/01	44.29%	2.88%	23.59%
wnchnma	Winchester	07/08/01	72.60%	15.69%	36.63%
wrrtnmt	Wartrace	07/01/01	47.10%	7.61%	23.57%
wttwttnma	Watertown	07/01/01	66.37%	9.42%	28.29%
wvrltnmt	Waverly	07/14/01	58.09%	10.75%	30.57%

REQUEST: For each wire center associated with BellSouth's Tennessee operations, please identify the percentage of loops by wire center for which LMU information is populated in the databases available to BellSouth personnel for obtaining LMU information.

RESPONSE: Please see Item 4 for response.

REQUEST: Do CLEC's operating in Tennessee have access to BellSouth's Corporate Facilities Database, Loop Engineering Information System ("LEIS") database and Loop Engineering Assignment Data ("LEAD") system database? If so, please indicate the manner in which CLEC's are permitted access (e.g. electronic, etc.). If CLEC's are permitted electronic access to the databases in question, please identify the BellSouth electronic interface (e.g. TAG, RoboTAG, LENS, etc.) through which electronic access is provided. For purposes of this question, the "Corporate Facilities" database, the LEIS database, and the LEAD database means those databases, regardless of their names used in Tennessee, that are identified and discussed on pages 67 – 77 of the North Carolina Utilities Commission's Recommended Order Concerning All Phase I and II Issues Excluding Geographic Deaveraging, in Docket No. P-10, Sub 133d (issued June 7, 2001).

RESPONSE: The Corporate Facilities database referenced in the North Carolina Utilities Commission's Recommended Order Concerning All Phase I and Phase II Issues Excluding Geographic Deaveraging, in Docket No. P-100, Sub 133d (issued June 7, 2001) only exists in North Carolina, South Carolina, Georgia, Florida, and part of Alabama. The type of information that is contained in the Corporate Facilities Database in those states is stored on paper plats in Tennessee. Individual districts within Tennessee may have scanned copies of these paper plats such that they may be stored on CDs or otherwise in electronic systems, but these would not be databases, have no "intelligence", and cannot be queried in any form. They are merely "pictures." BellSouth personnel use these paper plats to derive Loop Makeup information.

RESPONSE (Con't)

CLECs have access to this data in the manual LMUSI process.

Please refer to response to Item #2 for information on the LEIS system.

REQUEST: Do BellSouth Tennessee personnel have electronic access to BellSouth's Corporate Facilities database, LEIS database, and LEAD database?

RESPONSE: Please refer to response to Items #3 and #6.

REQUEST: Please identify and provide a copy of all BellSouth documents generated during the year 2000 and the current year to date that discuss CLEC access to LMU information in Tennessee.

RESPONSE: BellSouth objects to this Request as overbroad and unduly burdensome. BellSouth will consider a narrowed request if Sprint chooses to submit such a revised request.

REQUEST: Please produce all responses by BellSouth to the discovery requests of other parties in this docket.

RESPONSE: BellSouth objects to this request to the extent it attempts to impose an on-going obligation on BellSouth. BellSouth will produce to Sprint any responses served as of the date of BellSouth's response to this request.

REQUEST: Please produce all documents produced by BellSouth in response to the discovery requests of other parties in this docket.

RESPONSE: BellSouth objects to this request to the extent it attempts to impose an on-going obligation on BellSouth. BellSouth will produce to Sprint any responses served as of the date of BellSouth's response to this request.